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August 26, 2020

Via ECF

The Hon. Chief Judge Roslynn R. Mauskopf
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *ILKB, LLC v. Camac Partners LLC et al.*
Civil Action No. 1:20-cv-03850-RRM-VMS

Dear Chief Judge Mauskopf:

This firm represents Plaintiffs ILKB, LLC (“ILKB”) in connection with the above-captioned matter. ILKB is in receipt of Your Honor’s August 25, 2020 Order requiring ILKB to Show Cause in writing why this Court has subject matter jurisdiction over this action, and why plaintiff is likely to prevail on the merits of its claim alleging in Count III a purported civil violation under the Defend Trade Secrets Act pursuant to 18 U.S.C. § 1836 et seq. (Compl. (Doc. No. 1) at 87-101.) [Dkt. 10].

Since ILKB filed this action on August 21, 2020, it has had ongoing communications with counsel for the Defendants and as a result, the parties are close to resolving the TRO application. ILKB hopes to reach a final agreement with Defendants by the end of the week to resolve all non-monetary portions of their Defend Trade Secrets Act claims. Based on this anticipated development, ILKB would also be dismissing its claims for monetary relief without prejudice.

Accordingly, ILKB respectfully requests a brief extension of time until **Monday, August 31, 2020** to respond to Your Honor’s Order to Show Cause. [Dkt. 1]. ILKB’s response to Your Honor’s order to show cause is currently due on August 27, 2020. There have been no previous requests for an extension of time. We asked counsel for Defendants for their consent, but have not yet heard back from him. At this point, the extension would not affect any other deadlines. And, assuming we are successful, the resolution will obviate this Court’s further involvement in this matter.

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Your Honor's consideration regarding these issues is greatly appreciated.

Respectfully Yours,

GORDON & REES LLP

A handwritten signature in blue ink, appearing to read "Peter G. Siachos", is written over the firm name.

PETER G. SIACHOS (PS-1107)